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OFFICE OF HOMELAND SECURITY

GRANT MANAGEMENT MEMORANDUM 2008-034

Date: September 3, 2008

To: To Eligible Subgrantees and Interested Parties

From: Grants Management Division

RE: Fiscal Year (FY) 2008 Urban Areas Security Initiative-Nonprofit Security Grant Program

(UASI-NSGP) Pertinent Information and Requirements

This memorandum demonstrates how to compute match, provides additional match information, elaborates on federal procurement, and provides environmental planning and historic preservation requirements.

I. Match

Match Computation:

There is a 75-25 percent federal-subgrantee match requirement. Also assume that 3 percent will be retained by the State for Management and Administration (M&A) of the grant.

Net Grant Award

A subgrantee requests the maximum amount for the FY 2008 grant cycle:	\$75,000
Subtract three percent State M&A: (\$75,000 * 3%)	2,250
Net grant award amount	\$72,750
<u>Local Match Computation</u> Divide net grant award amount by federal required match (\$72,750 / 75%)	\$97,000
Subtract net grant award amount	\$72,750
Local Match	\$24,250

Therefore, if a subgrantee asks for \$75,000, they would receive at most \$72,750 and their match would be \$24,250.

Types of Match:

For equipment, the match can either be met with cash or in-kind contributions. In-kind contributions may include training investments related to the use of the grant-purchased equipment, or training investments related to general purpose security and emergency preparedness for staff. Department of Homeland Security has informed us that the only personnel costs that can be applied to meet the match must be related to training. According to the Code of Federal Regulations Title 44, Part 13, the in-kind match can also be met through equipment investments as long as the investments are in allowable equipment.

For grant-funded trainings only cash can be used to meet the match.

II. Training

Grant funds used toward training can only be used for the attendance fees and related expenses, such as materials and supplies, for <u>security personnel</u> to attend security-related training courses. Allowable training topics are limited to the protection of Critical Infrastructure/Key Resources including physical and cyber security, target hardening and terrorism awareness/employee preparedness.

Trainings conducted using FY 2008 NSGP funds must address a specific threat as identified in the Investment Justification. Proposed attendance at training courses and all associated costs must be included in the Investment Justification.

III. Procurement Requirements

Procurement refers to the process of obtaining goods and/or services necessary to carry out project objectives. Grantees must have written selection procedures for procurement transactions. Grantees can use their own procurement procedures that reflect applicable state and local laws and regulations, if the procurement process conforms to applicable federal law and standards, or they may use the federal policy. All procurement transactions will be conducted in a manner providing full and open competition.

Small Purchase

This method may be used for procurement of services, supplies, or other goods that cost less than \$100,000. A procurement of more than \$100,000 may not be inappropriately broken up into smaller components solely to qualify for the small purchase approach.

Competition is sought through oral or written price quotations. The grantee must document the receipt of an adequate number (usually three) of price or rate quotations from qualified vendors.

IV. Environmental Planning and Historic Preservation (EHP) Requirements

According to the Federal Emergency Management Agency Information Bulletin No. 271, grant funded projects must abide by EHP requirements. Several types of projects and activities have the potential to impact environmental resources and historic properties through ground disturbance, impact to wetlands, floodplains, coastal zones, other water resources, alteration of historically-significant properties, and by endangering different species.

Projects funded under FY 2008 NSGP with the potential to be impacted by EHP requirements include, but are not limited to, the following: communication towers, physical security enhancements, new construction, and renovation/modifications to buildings and structures that are 50 years old or older.

The following are specific examples of physical security-related equipment that may be impacted by EHP requirements:

- Surveillance and detection equipment such as closed-circuit television (CCTV) cameras, motion detection systems, ID card readers, x-ray devices, and sonar devices;
- Security measures and access controls such as lighting, fencing, doors, and gates.

The following are examples of potential impacts of physical security related projects to EHP resources:

- •Ground-disturbing activities associated with the installation of physical security measures, including trenching to lay wiring;
- The placement of equipment inside or on historic structures;
- The installation of outdoor physical security measures may impact historic districts and view-sheds.

Please visit http://www.fema.gov/library/viewRecord.do?id=3089 for EHP requirement details and to better understand how your organization's selected equipment may be impacted by EHP policy.

For further information or questions on any of the above information, please contact one of the FY 2008 NSGP Program Representatives.

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Sincerely,

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